

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GESTURE TECHNOLOGY PARTNERS,
LLC,

Plaintiff

v.

HUAWEI DEVICE CO., LTD., AND
HUAWEI DEVICE USA, INC.,

Defendants.

JURY TRIAL DEMANDED

C.A. NO. 2:21-cv-00040-JRG

LEAD CONSOLIDATED CASE

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

C.A. NO. 2:21-cv-00041-JRG

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Gesture Technology Partners, LLC (“GTP”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) (altogether, “Parties”) file this Joint Motion to Stay All Deadlines and Notice of Settlement.

GTP and Samsung have reached settlement in principle of all matters in controversy between the Parties and are in the process of finalizing the documents pertaining to the settlement. The Parties wish to conclude the settlement without burdening the Court with any additional filings and without incurring unnecessary expense. The Parties anticipate that they will be able to submit dismissal papers within thirty (30) days from the date of this filing. Accordingly, the Parties respectfully request that the Court grant a stay of all proceedings, including all pending deadlines between the Parties and with the Court, until March 11, 2022.

The Parties submit that good cause exists for granting this joint motion, as set forth above. This motion is not filed for purposes of delay, but so that justice may be served. Wherefore, the

Parties respectfully request that the Court enter the proposed order submitted with this joint motion and grant the Parties such other and further relief to which they are entitled.

Dated: February 9, 2022

Respectfully submitted,

By: /s/ Fred I. Williams

Fred I. Williams

Texas State Bar No. 00794855

Michael Simons

Texas State Bar No. 24008042

Robert Daniel Garza

Texas State Bar No. 24097730

Robert Rhodes

Texas State Bar No. 24116958

WILLIAMS SIMONS & LANDIS PLLC

The Littlefield Building

601 Congress Ave., Suite 600

Austin, TX 78701

Tel: 512-543-1354

fwilliams@wsltrial.com

msimons@wsltrial.com

dgarza@wsltrial.com

rrhodes@wsltrial.com

Todd E. Landis

State Bar No. 24030226

WILLIAMS SIMONS & LANDIS PLLC

2633 McKinney Ave., Suite 130 #366

Dallas, TX 75204

Tel: 512-543-1357

tlandis@wsltrial.com

John Wittenzellner

Pennsylvania State Bar No. 308996

WILLIAMS SIMONS & LANDIS PLLC

1735 Market Street, Suite A #453

Philadelphia, PA 19103

Tel: 512-543-1373

johnw@wsltrial.com

Kevin S. Kudlac

Texas Bar No. 00790089

Kudlac PLLC

1916 Wimberly Lane

Austin, TX 78735

Tel: 512-656-5743
kevin@kudlacIP.com

Attorneys for Plaintiff
Gesture Technology Partners, LLC

/s/ Christopher W. Kennerly
Christopher W. Kennerly (TX Bar No. 00795077)
chriskennerly@paulhastings.com
Radhesh Devendran (*pro hac vice*)
radheshdevendran@paulhastings.com
PAUL HASTINGS LLP
1117 S. California Avenue
Palo Alto, CA 94304
Telephone: (650) 320-1800
Facsimile: (650) 320-1900

Allan M. Soobert
allansoobert@paulhastings.com
PAUL HASTINGS LLP
2050 M Street NW
Washington, D.C. 20036
Telephone: 202-551-1700
Facsimile: 202-551-1705

Elizabeth L. Brann
elizabethbrann@paulhastings.com
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
Telephone: (858) 458-3000
Facsimile: (858) 458-3005

Robert Laurenzi
robertlaurenzi@paulhastings.com
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090

Melissa R. Smith (TX Bar No. 24001351)
GILLAM & SMITH, LLP
303 S. Washington Ave.
Marshall, TX 75670
Telephone: (903) 934-8450

Facsimile: (903) 934-9257
melissa@gillamsmithlaw.com

*Attorneys for Defendants Samsung Electronics Co.,
Ltd and Samsung Electronics America, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 9, 2022 the undersigned caused a copy of the foregoing document to be served on all counsel of record via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

/s/ Fred I. Williams
Fred I. Williams

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Gesture Technology Partners, LLC and counsel for Samsung Electronics Co., Ltd. and Samsung Electronics America Inc., met and conferred, and all parties agree to filing the foregoing document as a joint motion.

/s/ Fred I. Williams
Fred I. Williams